U.S. Department of Transportation
United States Coast Guard

Commandant
United States Coast Guard

Washington, D.C. 20593-0001
Staff Symbol: G-NRS-3
Phone: 202/267-1948

5420/ICSAR

Mr. William F. Caton
Acting Secretary
Federal Communications Commission
1919 M Street NW, Room 222
Washington, DC 20554

Dear Mr. Caton:

In accordance with 47 C.F.R. of the Commission's Rules, the Interagency Committee on Search and Rescue (ICSAR) submits the following reply comments to CC Docket No. 92-166, Amendment to the Commission's Rules to Establish Rules and Policies Pertaining to a Mobile Satellite Service in the 1610-1626.5/2483.5-2500 MHz Frequency Bands.

Our Committee is made up of seven federal agencies including the FCC, having search and rescue (SAR) responsibilities under the United States National Search and Rescue Plan. The FCC has certain regulatory and operational SAR responsibilities which align its concerns with those of ICSAR. In reference to the subject NPRM ICSAR invites the FCC to note that:

Emergency communications are of great importance to SAR, disaster response and other emergency response services;

The proposed mobile satellite service in the 1610-1626.5/2483.5-2500 MHz frequency bands offers potential to greatly improve emergency communications for SAR and disaster response operations;

Ability of the subject Mobile Satellite Services (MSS) to contribute to the SAR and disaster response efforts depends on the degree to which they are compatible with each other and with existing emergency response networks; and

The lack of identification and position information from most cellular networks causes potential loss of life, and makes false alarms hard to resolve.

Reference is made to the enclosed comments received by the FCC to the subject docket.

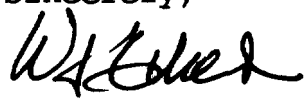
Comments by the Coast Guard and the Attorney General for the State of Texas are fully supported by ICSAR. Ability of MSS terminals to access Public Safety Answering Points through the Public Switched Telephone Network is inherent in the MSS systems, and not requiring access provisions could lead to even graver

consequences than those cited for the cellular systems.

The referenced comments of Constellation Communications Inc., Motorola Satellite Communications Inc., and LORAL/QUALCOMM Partnership (as well as statements made in filings of all of the proposed Big LEO providers) clearly support expectations that MSS systems will be available for distress and safety purposes. ICSAR recommends that the FCC develop requirements to ensure that MSS services meet public safety needs.

In the interests of expediting the MSS systems implementation we suggest that these issues be considered in a separate proceeding, such as the one referenced in paragraph 139 of the Commission's Second Report and Order, GEN Docket 90-314.

Sincerely,



W. J. ECKER
Chairman, Interagency Committee
on Search and Rescue

Enclosure

Copy: Chief, Common Carrier Bureau
Chief, Office of Engineering & Technology
Chief, Private Radio Bureau
Chief, Field Operations Bureau

SUMMARY OF PERTINENT COMMENTS

TO

FCC NPRM, CC DOCKET NO. 92-166

1. COMMENTS OF OFFICE OF THE ATTORNEY GENERAL, STATE OF TEXAS

"TX-ACSES has the same concerns in CC Docket No. 92-166 with respect to mobile satellite services as in Docket No. 90-314 pertaining to PCS. TX-ACSEC wants to insure that all people in Texas get immediate emergency assistance by dialing 9-1-1 through all types of communications technology used to originate an emergency call."

2. COMMENTS OF THE US COAST GUARD

"The office of the Attorney General, State of Texas, in its Petition for Reconsideration in GEN Doc 90-314 asked that the carrier provide calling party location information to Enhanced 9-1-1 systems in a format the local 911 system can interpret and use, and that a single uniform standard for delivery of the calling party's location be developed. We request that these provisions also apply to mobile satellite systems developed as a result of this proceeding."

"We also request that a Caller ID capability be provided with this mobile satellite system for calls made to a public agency's emergency telephone line."

"Finally we note that other safety issues need to be resolved, such as the format, routing and priority of emergency data-only calls, as well as the ability to reply to such calls."

3. COMMENTS OF CONSTELLATION COMMUNICATIONS INC., PAGE 10

"Value-added services combining voice and data communications and position determination will greatly expand the utility of the Constellation system. Such integrated applications could include disaster management, search and rescue, etc."

4. COMMENTS OF MOTOROLA SATELLITE COMMUNICATIONS INC., PAGES 5 & 15

"Big LEO MSS systems also enjoy decisive advantages over terrestrial technologies, as they will not face the limited range and similar inhibitions of cellular and other similar mobile services. These advantages will become especially important in times of crises and emergency when terrestrial based systems may be impaired or overloaded. Unlike terrestrial systems, LEO MSS systems, like the IRIDIUM system, will not be significantly affected by natural disasters such as earthquakes, fires, floods or hurricanes. The inherent portability of Big LEO MSS terminals makes such systems ideal for emergency, rescue, medical and other such crises teams."

They will enable rescue groups to identify the positions of callers."

5. COMMENTS OF LORAL/QUALCOMM PARTNERSHIP, L.P., PAGE 14

"GLOBALSTAR can fulfill the urgent need for dependable ubiquitous communications that arises in the event of natural disasters and other emergencies. The success of any disaster recovery operation depends on reliable communications, but terrestrial networks are themselves vulnerable to such disasters."